

**UNITED STATES DISTRICT COURT**

**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

**THIS DOCUMENT RELATES TO:  
ALL ACTIONS**

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

**STIPULATION AND [PROPOSED]  
ORDER REQUESTING ADDITIONAL  
TIME FOR COMPLETION OF  
CERTAIN FACT DISCOVERY**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned  
2 counsel, hereby stipulate and respectfully request that the Court extend the deadline for Plaintiffs  
3 and Defendants Google, LLC and YouTube, LLC (“Defendants”) to complete certain fact  
4 discovery.

5 WHEREAS, despite the parties’ best efforts and diligence to resolve all fact discovery  
6 issues before the April 4, 2025 deadline, certain discovery issues will not be complete and/or ripe  
7 for briefing by April 4, 2025. Accordingly, Plaintiffs and Defendants have mutually agreed to  
8 schedule the following:

- 9 1. With respect to the completion of 30(b)(1) fact depositions, the parties agree to take  
10 the final fact deposition witness, YouTube CEO Neal Mohan, on April 24, 2025.
- 11 2. With respect to the completion of 30(b)(6) testimony, oral and written, the parties  
12 agree to the following:
  - 13 a. Oral testimony on 30(b)(6) Topics IV.8 and VI.11 will occur remotely on a  
14 mutually agreed upon date in the second week of April 2025.
  - 15 b. Oral testimony on the final 30(b)(6) topic will occur on a date to be mutually  
16 agreed upon by the Parties but no later than April 24, 2025.
  - 17 c. Written responses to all remaining agreed upon 30(b)(6) topics will be provided  
18 by Defendants no later than April 25, 2025.
- 19 3. To the extent there remains any dispute related to the above deposition testimonies  
20 that are scheduled to take place and be produced after the fact discovery deadline, the  
21 parties agree to hold an initial meet and confer no later than April 30, 2025, any necessary  
22 H(2) no later than May 7, 2025, and any subsequent Joint Letter Brief filed no later than  
23 May 14, 2025.
- 24 4. The parties agree that the requested extensions herein will not affect any other  
25 deadline affixed by the Court.

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## IT IS SO ORDERED

DATED: April 4, 2025

Hon. Peter H. Kang  
United States District Court Magistrate Judge

DATED: April 4, 2025

## **WILSON SONSINI GOODRICH & ROSATI**

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DATED: April 4, 2025

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19 *Attorneys for Plaintiffs*

21 **ATTESTATION**

22 I, Audrey Siegel, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the  
 23 concurrence to the filing of this document has been obtained from each signatory hereto.  
 24

25 Dated: April 4, 2025

26 By: /s/ Audrey Siegel  
 27 Audrey Siegel